



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 17 2014

CERTIFIED MAIL 7012 1010 0001 8097 2645
RETURN RECEIPT REQUESTED

Mr. Gerard Brewer
City of Alexander City
P.O. Box 552
Alexander City, Alabama 35011

Re: EPA Comments on Sanitary Sewer Overflow Plan
Administrative Order on Consent No.: CWA-04-2014-4762
National Pollutant Discharge Elimination System Permit Nos.: AL0048861 and AL0021156
City of Alexander City, Alabama

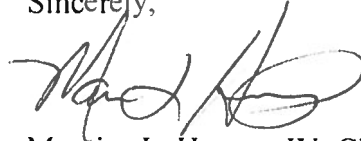
Dear Mr. Brewer:

The U.S. Environmental Protection Agency Region 4 is in receipt of the Sewer Overflow Response Plan (SORP), which was submitted by the City of Alexander City (City) on November 14, 2014. This submittal was made in accordance with Administrative Order on Consent (AOC) CWA-04-2014-4762, paragraph 15.A. The EPA has reviewed the submittal and has the following comments:

- A. As discussed with you on December 12, 2014, the City failed to incorporate procedures for 1) estimation of sanitary sewer overflow (SSO) flow rates and volumes; and 2) guidelines for post-SSO investigation activities. These procedures were included as Attachments C and D to the February 12, 2014, version of the SORP referenced in paragraph 15.A. of the AOC. Please revise the SORP to include these procedures.
- B. In the last bullet of the last page of Section 2.1, reference is made to Figure XX. Please revise the SORP to include an accurate reference to the appropriate Figure.
- C. Regarding containment of SSOs by the City, the EPA would suggest that in addition to utilizing a pump at the location of an SSO, the City consider purchasing berms and utilizing them when appropriate to protect downstream storm drains/water bodies.

Please make the appropriate revisions and submit a revised SORP to the EPA within 30 days of receipt of this letter. If you have any questions regarding this letter please contact Ms. Laurie Jones, Enforcement Officer, at (404) 562-9201. Legal inquiries should be directed to Ms. Wilda Cobb, Associate Regional Counsel, at (404) 562-9530.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maurice L. Horsey, IV', written over the word 'Sincerely,'.

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
NPDES Permitting and Enforcement Branch

cc: Ms. Glenda Dean
Alabama Department of Environmental Management

Mr. Scott Cummings
CH2M Hill

Mr. William S. Cox III
Lightfoot, Franklin, White LLC